

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND**

IN RE:

VERNDEL M. WHITE

Debtor

Case No. **24-15864-LSS**
Chapter 13

**MOTION TO DISMISS AND
NOTICE OF OPPORTUNITY FOR A HEARING**

Comes now, REBECCA A. HERR, Chapter 13 Trustee herein and states that the Debtor is in material default with respect to the terms of the plan as confirmed by the Court in that the payments by or for the Debtor has not been made as proposed.

The material default consists of \$11,649.00, representing 7.06 plan payments.

The Trustee's office informed the Debtor of this default on 05/01/2025. As of today's date, the debtor has failed to cure the default.

WHEREFORE, the Trustee moves that the subject case be dismissed pursuant to 11 U.S.C. Sec. 1307(c).

Date: June 20, 2025

Respectfully Submitted,

/s/ **REBECCA A. HERR**

REBECCA A. HERR
CHAPTER 13 TRUSTEE
185 ADMIRAL COCHRANE DR.
SUITE 240
ANNAPOLIS, MD 21401
RHERR@CH13MD.COM

NOTICE OF OPPORTUNITY TO REQUEST A HEARING

You are notified of the filing of the foregoing Motion by the Trustee stating that the Debtor is in material default with respect to the terms of the confirmed plan and requesting that the subject case be dismissed pursuant to 11 U.S.C. 1307 (c).

You are further notified that unless a responsive pleading is filed with the Court stating facts which controvert, justify or explain the Trustee's allegations and a copy of said pleading is served upon the Trustee on or before **July 11, 2025** together with a request for a hearing thereon, this case will be dismissed on such date and the case will be closed. You are further advised that you may move to convert this case to a case under Chapter 7. If you desire to do so, such action must be filed with the clerk's office before **July 11, 2025**. A \$25.00 fee is required to the clerk's office for conversion to Chapter 7.

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of June, 2025, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Motion to Dismiss will be served electronically by the Court's CM/ECF system on the following:

Tommy Andrews tandrews@andrewslaw.net,
derek@andrewslaw.net;khill@andrewslaw.net;AndrewsLawFirmPC@jubileebk.net
(Debtor's Counsel)

I hereby further certify that on the 20th day of June, 2025, a copy of the Motion to Dismiss was also mailed first class mail, postage prepaid to:

VERNDEL M. WHITE
9300 ALLENTOWN RD.
FORT WASHINGTON, MD 20744
Debtor

/s/ REBECCA A. HERR

REBECCA A. HERR
CHAPTER 13 TRUSTEE

RECEIPT HISTORY

Receipt Date	Receipt Source	Receipt Description	Receipt Amount
08/19/2024	403	PERSONAL CHECK FROM DEBTOR	\$1,600.00
09/23/2024	406	PERSONAL CHECK FROM DEBTOR	\$1,600.00
11/12/2024	409	PERSONAL CHECK FROM DEBTOR	\$1,650.00
11/21/2024	414	PERSONAL CHECK FROM DEBTOR	\$1,651.00

TOTAL RECEIPTS: \$6,501.00